

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA

AARON LARRY BOWMAN

*** CIVIL ACTION.**

VERSUS

*** DOCKET NO. 3:20-cv-01372**

**OUACHITA PARISH SHERIFF'S
OFFICE, ET AL.**

*** JUDGE TERRY A. DOUGHTY**
*** MAGISTRATE JUDGE KAREN L. HAYES**

**PLAINTIFF'S MOTION TO AMEND COMPLAINT AND VOLUNTARILY DISMISS
ALL CLAIMS UNDER 42 U.S.C. § 1983**

NOW INTO COURT, through undersigned counsel, comes Mr. Aaron Bowman ("Mr. Bowman"), who respectfully moves this Court under F.R.C.P. art. 15(a)(2) to permit Plaintiff to amend his complaint to voluntarily dismiss all federal claims under 42 U.S.C. §1983. *See* Amended Complaint (ECF#19). Specifically, Plaintiff seeks to strike Paragraph 45 and Paragraph 50(#11) & #12 (as to attorney fees). Defendants will suffer no prejudice as discovery has not even begin in this matter. As such, this Court should "freely give leave" to amend. F.R.C.P. art. 15(a)(2).

Respectfully Submitted,

/s/ Christopher J. Murell

Christopher J. Murell (#32075)

Unglesby Law Firm

246 Napoleon Street

Baton Rouge, Louisiana 70802

Telephone: (225) 387-0120

Fax: (225) 336-4355

Chris@unglesbylaw.com

Ronald S. Haley, Jr. (#30900)

Haley & Associates

8211 Goodwood Blvd., Suite E
Baton Rouge, Louisiana 70806
Telephone: (225) 663-8869
Fax: (225) 888-900-9771
Rhaley@ronaldhaleyfirm.com

Donecia Banks-Miley, #35641
Jessica Williams, # 32956
**Pleasant, Williams & Banks-Miley
Law Group, LLC**
901 North 3rd Street
Monroe, Louisiana 71201
318.605.4607 phone
318.605.4617 facsimile
dbmiley@pwblaw.net
jwill@pwblaw.net
Counsel for Aaron Bowman

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing has been served on all counsel of record,
through the U.S Courts PACER system on this 14th day of January 2021,
by electronically filing the same.

/s/ Christopher Murell